

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In re ex parte Application of Natica Shipping
Ltd.,

:
:
Case No. 12-misc-240-P1

: **NOTICE OF MOTION**

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law in Support of Motion and the accompanying Declaration of Timothy S. Pfeifer dated November 28, 2012 and the exhibits attached thereto, Movants RTI Limited, United Company Rusal PLC, Alumina & Bauxite Co., Ltd., Rual Trade Ltd., Calibre Properties Worldwide Ltd., and Mont Cervin – Consultadoria E Servicos Unipessoal LDA (collectively, the “Rusal Parties”) will move this Court, before the Honorable Victor Marrero, in Courtroom 20B, United States District Court for the Southern District of New York, United States Courthouse, 500 Pearl Street, New York, New York 10007, or before such other District Court Judge for the Southern District of New York as may be Presiding over Part One matters, for an Order: (i) reopening the above-captioned proceeding (the “Natica Action”); (ii) allowing the Rusal Parties to intervene in the Natica Action; (iii) vacating the order dated July 19, 2012 granting the application of Natica Shipping Ltd. under 28 U.S.C. § 1782(a) (the “1782 Order”); (iv) quashing the subpoenas issued under the 1782 Order; and (v) granting such further relief as the Court deems appropriate.

Dated: New York, New York
November 28, 2012

Respectfully Submitted,

BAKER & HOSTETLER LLP

/s/ Timothy S. Pfeifer

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